November 6, 2015

Mr. Scott Manzano
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, Oregon 97204

RE: RESPONSE TO OCTOBER 8, 2015 LETTER
OUTFALL 22B IRAM PERFORMANCE MONITORING SECOND QUARTER 2015 REPORT
FORMER RHÔNE-POULENC – PORTLAND SITE

Dear Mr. Manzano:

On behalf of StarLink Logistics, Inc. (StarLink), this letter provides responses to specific comments 1 and 3 provided by you in the above referenced letter of October 8, 2015.

Specific Comment 1: Page 6, 4.2 Field Parameter Results. The report identifies the NL-Gould Superfund Site remedy as the likely source of elevated pH in groundwater along the edge of the ESCO property due to weathering of foundry sand material and the neutralization of battery acid that likely occurred as part of battery waste stabilization efforts on their site. DEQ notes that several remedial actions were conducted to neutralize herbicide production waste in former Doane Lake and West Doane Lake. As presented in the RI/SCE Report Addendum 1 Appendix B-Table Showing Status of Certain Actions Related to Former Rhone-Poulenc Operations, lime was added to former Doane Lake in 1965 to increase pH to between 8 and 9 in order to treat odor issues associated with herbicide production waste. In 1980, the Lake Area Drainage Ditch was treated with lime, and West Doane Lake was also treated with lime between 1980 and 1987. Please include this information and provide additional detail if available to document other potential sources and causes related to elevated pH in the vicinity of former Doane Lake sediments in future applicable submittals to DEQ.

Starlink Response: The lime treatment of Doane Lake occurred for limited periods. The lime treatment was not considered a source of the pH encountered near the 22B sewer line because of its limited use and lack of similar pH levels in shallow groundwater in the area where lime was applied and it is outside the area near the 22B sewer line. Disposal of significant quantities of lime waste by other parties occurred in the northern portion of the Schnitzer property and much of this disposal occurred in former Doane Lake and East Doane Lake. High pH groundwater was described in the RI that was associated with areas near ESCO, NL-Gould, Air Liquide and Arkema (RI/SCE Section 8.3 (AMEC 2010[1])). Therefore, ESCO, NL-Gould and Schnitzer are the likely sources for elevated pH detected in non-stormwater flow at 22B and the 22B manholes due to their geographic proximity to the portion of 22B where elevated pH was detected.

Specific Comment 3: Table 5: Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring-Detected Results Summary. The data validation report does not provide rational for reporting estimated maximum possible concentration (EMPC) results as "U" (The constituent was analyzed for, but was not detected above the reported sample quantitation limit). As previously discussed with StarLink, DEQ

[1] AMEC, 2010. RI/SCE Report, RP – Portland Site, submitted to Oregon Department of Environmental Quality, November 19, 2010.

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generally follows EPA guidance regarding the use of qualified data in risk assessments. The most commonly encountered data qualifier is J, indicating an estimated value. J-qualified data are considered the same as unqualified data for risk assessment purposes. Similarly, EMPC qualified data are also considered the same as unqualified data for risk assessment purposes.

Please revise the report to include updated summary tables that appropriately indicate EMPC detections. DEQ also requests that StarLink confirm in an e-mail or other written response that EMPC values were included in all site risk assessments, and are also presented correctly in the RI/SCE Report. Please clearly indicate if the value presented as valid sampling data is an EMPC detected value in future submittals to DEQ.

Starlink Response: EPA guidance for laboratory reporting was followed in the report. The results that DEQ referred to were presented as reported by the laboratory (Vista Analytical Laboratory, El Dorado Hills, California). The laboratory routinely reports PCDD/F, OCI and PCB congener results with EMPC values but either as non-detect (ND) or as detected (results with or without EMPC values). No changes were made to the EMPC reported results during validation and results were reported as received from the laboratory. Table 5 is a summary of "detected" parameters; therefore listing laboratory results reported as ND in Table 5 is not appropriate. Laboratory results with EMPC non-detect values and EMPC detected values were reported in Table 6. Similarly, in the RI-SCE and risk assessment reports EMPC non-detect values were treated as non-detects, EMPC detected values were treated as detects.

If you have any questions, please contact Joan Underwood at (503) 278-1837 or Kent Angelos at (425) 883-0777.

Sincerely,

GOLDER ASSOCIATES INC.

Kent M. Angelos
Principal and Senior Program Leader

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